IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

EASTERN DISTRICT OF TOWN

MAR 14 2013

DAVID J. MALAND, OLSTIC

UNITED STATES OF AMERICA

§ § §

v.

NO. 4:11CR237
Judge Schell

DANISH SALEEM

## **FACTUAL STATEMENT**

The defendant **Danish Saleem** (**Saleem**) stipulates and agrees that the following facts are true and correct:

- 1. On or about November 17, 2011, in the Eastern District of Texas, **Danish Saleem**, defendant, did knowingly possess matter, specifically an Sony VAIO laptop with a Toshiba hard drive, that contained more than one visual depiction of sexually explicit conduct of minors that had been transported in interstate by computer, and which were produced using materials that had been mailed, transported, and shipped in interstate and foreign commerce.
- 2. Saleem knew that the images contained visual depictions of minors engaged in sexually explicit conduct and that the images did in fact depict visual depictions of minors engaged in sexual conduct. Included in the images possessed by Saleem were the following:

COMPUTER FILE NAME	DESCRIPTION
LC-46562.jpg	An image depicting a prepubescent female with her mouth open, while an adult male squirts a liquid from his penis into her mouth.
LC-16588.jpg	An image depicting a prepubescent female performing oral sex on an adult male.
LC-16587.jpg	An image depicting a prepubescent female with an adult penis in her hand.
LC-16535.jpg	An image depicting a prepubescent female's genitalia while an adult inserts a finger into her anus.
LC-46561.jpg	An image depicting a prepubescent female performing oral sex on an adult male.
LC-154016.jpg	An image depicting the lewd and lascivious display of a prepubescent female's genitalia.
LC-51037.jpg	An image depicting the lewd and lascivious display of a prepubescent female's genitalia.

- 3. **Saleem** knowingly possessed more than 600 images of visual depictions of minors engaging in sexually explicit conduct.
- 4. **Saleem** used the following computer equipment to possess the visual depictions:
  - a. Sony VAIO laptop computer (Serial # 275148453002135);
  - b. Toshiba hard drive (Serial # Y9EHC2VBT); and
  - c. Seagate external hard drive (Serial # 9QF4Q6MX).

5. **Saleem** agrees that the Sony VAIO laptop computer and the Toshiba hard drive were not manufactured in the State of Texas and had been transported in interstate and foreign commerce.

## SIGNATURE AND ACKNOWLEDGMENT BY THE DEFENDANT DANISH SALEEM

I have read this Factual Statement and have discussed it with my attorney. I fully understand the contents of this Factual Statement and agree without reservation that it accurately describes my acts.

Dated: <u>24/12/12</u>

DANISH SALEEM

Defendant

## SIGNATURE AND ACKNOWLEDGMENT BY ATTORNEYS FOR THE DEFENDANT

We have read this Factual Statement and the Indictment and have reviewed them with our client. Based our discussions with our client, we are satisfied that our client fully understands the Factual Statement.

Dated:

DEAN BOLAND

**THOMAS COX** 

Attorneys for Defendant